

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

**Affirmation in Support of Application
for an Order of Continuance**

ROBERT A. OLINS,

15-MJ-03020

Defendant.

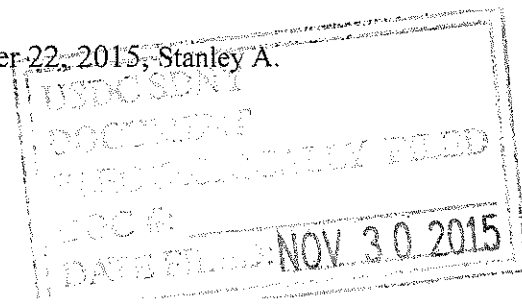
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State of New York)
County of New York : ss.:
Southern District of New York)

Christine I. Magdo, pursuant to Title 28, United States Code, Section 1746, hereby
declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Preet Bharara, United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which an indictment or information would otherwise have to be filed, pursuant to 18 U.S.C. §3161(h)(7)(A).

2. The defendant was arrested and presented before Magistrate Judge James L. Cott in the Southern District of New York on August 26, 2015. Federal Defenders of New York was appointed as counsel for the defendant for the purposes of presentment, bail conditions were set and the defendant was released on or about August 26, 2015 pursuant to those conditions. The defendant waived his right to have an indictment or information filed for 30 days; therefore, under the Speedy Trial Act, the Government initially was required to file an indictment or information on or before September 28, 2015. On or about September 22, 2015, Stanley A.




Twardy, Esq. was retained as counsel for the defendant and entered a notice of appearance on or about September 25, 2015. On or about September 28, 2015, Magistrate Judge Dolinger entered an order of continuance extending the time by which the Government was required to file an indictment or information until October 28, 2015. On or about October 28, 2015, Magistrate Judge Francis entered a second order of continuance extending the time by which the Government was required to file an indictment or information until November 30, 2015.

3. Defense counsel and I have engaged in discussions concerning a possible disposition of this case and are continuing discussions concerning a possible disposition of this case. The negotiations have not been completed, and we plan to continue our discussions but in light of the Thanksgiving holiday this week, do not anticipate a resolution before the deadline under the Speedy Trial Act expires on November 30, 2015.

4. Therefore, the Government is requesting a 14-day continuance until Monday, December 14, 2015 to continue the foregoing discussions and reach a disposition of this matter. I personally communicated with defense counsel on November 20, 2015, and defense counsel consents to this request.

5. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York
November 23, 2015


Christine I. Magdo
Assistant United States Attorney
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